

Plaintiff,

V.

**CASE NO.: 20-cv-4366**

D&A SERVICES, LLC  
1400 EAST TOUHY AVENUE-SUITE  
G2  
DES PLAINES, IL  
60018

Defendant.

## NOTICE OF REMOVAL

PLEASE TAKE NOTICE that defendant, D&A Services, LLC (“D&A”), through undersigned counsel and pursuant to 28 U.S.C. §§ 1331, 1441, and 1446 *et seq.*, hereby removes this action from the Court of Common Pleas, Chester County, Commonwealth of Pennsylvania, to the United States District Court for the Eastern District of Pennsylvania. In support of this Notice of Removal, D&A states as follows:

1. On August 4, 2020, plaintiff, Michelle Hastie (plaintiff), commenced a civil action in the Court of Common Pleas, Chester County, Commonwealth of Pennsylvania, entitled and captioned *Michelle Hastie v. D&A Services, LLC*, Case No. 2020-05030-MJ (hereinafter the “State Court Action”). No further proceedings before the State Court have occurred.

2. In the Complaint, plaintiff alleges statutory causes of action against D&A. A true and correct copy of plaintiff's Complaint is attached hereto as Ex. "A."

3. Plaintiff accuses D&A of violating the Fair Debt Collection Practices Act, 15 U.S.C. § 1692, *et seq.* Plaintiff has also alleged a state law cause of action.

4. D&A received plaintiff's Complaint on or about August 10, 2020.

5. This Court has jurisdiction over plaintiff's claim pursuant to 28 U.S.C. §§ 1331 and 1441 in that the claims are founded on a claim or right arising under the laws of the United States. This Court has supplemental jurisdiction over plaintiff's state law claim, pursuant to 28 U.S.C. 1441(c).

6. This Notice of Removal is timely, having been filed within thirty (30) days of the date on which D&A received plaintiff's Complaint. *See* 28 U.S.C. § 1446.

7. Written notice of this Notice of Removal of this action is being immediately provided to the Court of Common Pleas, Chester County, Commonwealth of Pennsylvania. *See* Exhibit "B" attached hereto.

8. Written notice of this Notice of Removal of this action is being caused to be served on plaintiff.

WHEREFORE, defendant, D&A Services, LLC, gives notice that this action is removed from the Court of Common Pleas, Chester County, Commonwealth of Pennsylvania, to the United States District Court for the Eastern District of Pennsylvania.

Dated: September 4, 2020

Respectfully Submitted,

/s/ Aaron R. Easley 

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*Attorney for Defendant,  
D&A Services, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 4th day of September, 2020, a copy of the foregoing **Notice of Removal** was electronically filed with the Clerk of the Court, United States District Court for the Eastern District of Pennsylvania and served upon the following via U.S. Mail:

Fred Davis, IV Esq.  
Davis Consumer Law firm  
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Willow Grove, PA 19090  
Email: fdavis@usacreditlawyer.com  
*Attorney for Plaintiff*

/s/ Aaron R. Easley 

Aaron R. Easley, Esq.